

CARELLA, BYRNE, CECCHI, OLSTEIN,
BRODY & AGNELLO, P.C.

JAMES E. CECCHI
5 Becker Farm Road
Roseland, NJ 07068
Telephone: 973/994-1700
973/994-1744 (fax)
jcecchi@carellabyrne.com

Proposed Liaison Counsel

[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

CREIGHTON TAKATA, Individually)	Case No. 3:18-cv-02293-FLW-TJB
and on Behalf of All Others Similarly)	
Situated,)	
)	
Plaintiff,)	
)	
vs.)	
)	
RIOT BLOCKCHAIN, INC. f/k/a)	
BIOPTIX, INC., et al.,)	
)	
Defendants.)	
_____)	

**NOTICE OF MOTION OF SAROOR ALAM
FOR APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF SELECTION OF COUNSEL**

PLEASE TAKE NOTICE that on May 21, 2018, at or such other date as the Court designates, and at a time designated by the Court, the undersigned counsel for proposed Lead Plaintiff Saroor Alam will respectfully move before the Honorable Freda L. Wolfson at the United States District Court, District of New Jersey (Trenton) for an Order: (1) appointing Saroor Alam as Lead Plaintiff; (2) approving Saroor Alam's selection of Robbins Geller Rudman & Dowd LLP to serve as Lead Counsel; (3) approving Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. to serve as Liaison Counsel; and (4) granting such other and further relief as the Court may deem just and proper.

The undersigned intends to rely upon the annexed Brief and Declaration of James E. Cecchi. A proposed Order accompanies this motion.

The undersigned hereby requests oral argument.

DATED: April 18, 2018

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.
JAMES E. CECCHI

s/ James E. Cecchi

JAMES E. CECCHI

5 Becker Farm Road
Roseland, NJ 07068
Telephone: 973/994-1700
973/994-1744 (fax)
jcecchi@carellabyrne.com

*Proposed Liaison Counsel for
Proposed Lead Plaintiff*

ROBBINS GELLER RUDMAN
& DOWD LLP
JACK REISE
DOUGLAS WILENS
ROBERT J. ROBBINS
SABRINA E. TIRABASSI
120 East Palmetto Park Road, Suite 500
Boca Raton, FL 33432
Telephone: 561/750-3000
561/750-3364 (fax)
jreise@rgrdlaw.com
dwilens@rgrdlaw.com
rrobbins@rgrdlaw.com
stirabassi@rgrdlaw.com

ROBBINS GELLER RUDMAN
& DOWD LLP
LUCAS F. OLTS
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)
lolts@rgrdlaw.com

*Proposed Lead Counsel for
Proposed Lead Plaintiff*

BOTTINI & BOTTINI, INC.
FRANCIS A. BOTTINI, JR.
7817 Ivanhoe Avenue, Suite 102
La Jolla, CA 92037
Telephone: 858/914-2001
858/914-2002 (fax)
fbottini@bottinilaw.com

*Additional Counsel for
Proposed Lead Plaintiff*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 18, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record.

s/ James E. Cecchi
JAMES E. CECCHI